

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

IN RE:

CHAPTER 7

**MICHAEL E. YOUNG and
MELISSA RENEE YOUNG**

CASE NO. 10-03025-EE

**MOTION FOR EXTENSION OF TIME
IN WHICH TO OBJECT TO DISCHARGEABILITY AND/OR DISCHARGE**

COMES NOW, First Heritage Credit of Mississippi, LLC (hereinafter referred to as “First Heritage”) by and through its attorney, and files this its Motion for Extension of Time in which to Object to Dischargeability and/or Discharge, and would show unto the Court the following, to-wit:

1. That on August 27, 2010, the Debtors filed a petition for relief under Chapter 7 of the United States Bankruptcy Code.
2. That the filing deadline for Complaints pursuant to 11 U.S.C. §523 and §727 has been set for December 20, 2010.
3. That First Heritage respectfully requests that the Court allow it an additional sixty (60) days after December 20, 2010, being February 18, 2011, in which to complete discovery in order to determine whether to file an Objection to Dischargeability and/or Discharge.

WHEREFORE, PREMISES CONSIDERED, First Heritage Credit of Mississippi, LLC respectfully requests that this Court enter an order granting it an additional sixty (60) days after December 20, 2010, being February 18, 2011, in which to file a Complaint Objecting to Dischargeability of its debt, or to the Debtors’ Discharge, and for such other and further relief as the Court deems proper.

Respectfully submitted,

FIRST HERITAGE CREDIT OF MISSISSIPPI, LLC

BY: /s/ Eileen N. Shaffer
EILEEN N. SHAFFER
Its Attorney

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CERTIFICATE OF SERVICE

I, Eileen N. Shaffer, attorney for First Heritage Credit of Mississippi, LLC, do hereby certify that I have caused to be mailed by United States Mail, postage prepaid, or electronically, a true and correct copy of the above and foregoing Motion for Extension of Time to Object to Dischargeability And/Or Discharge, to the following, on the day and year hereinafter set forth:

Edwin Woods, Jr., Esq.
Attorney for Debtor
edwinwoodsjr@gmail.com

Stephen Smith
Chapter 7 Trustee
trustee1@smithcpafirm.com

United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

SO CERTIFIED this the 14th day of December, 2010.

/s/ Eileen N. Shaffer
EILEEN N. SHAFFER